



Australian Government



Australian
**Small Business and
Family Enterprise**
Ombudsman

Mr Bruce Tonkin
auDA
PO Box 18315
Melbourne VIC 3001

By email: bruce.tonkin@auda.org.au

30 May 2019

Bruce

Dear Mr Tonkin

Policy Review Panel: Reform of Existing .au Policies and Implementation of Direct Registration

Thank you for the opportunity to make a further submission to the review into domain names in Australia. Domain names are extremely important to small business as they allow for greater visibility and provide growth opportunities. We welcome the amendments recommended in the final report as they provide greater coverage and allow small businesses greater economic opportunities.

Allocation model

We support the priority allocation model when there is no conflict as the purchase cost of a domain name(s) can be significant for small to medium enterprises (SMEs). Given that the priority period is six months from the Launch Date, we recommend that SMEs be notified of the time frame before Launch Date to give them the maximum opportunity to secure the single level domain (SLD) name.

Lock down model

A domain name for an SME signifies a significant investment in online marketing, search engine listings and most importantly customer goodwill and business reputation. We support the allocation rule of a "lock down" model as it would protect a SME with online sales from losing business due to confusion over another online seller with a similar name. If an SLD is disputed, the conflict resolution process provides the ability to negotiate release of a domain name which is essential to ensure continuity of business operation.

National awareness campaign

We support *Recommendation 25* for a widespread education and awareness campaign as SMEs are time poor and often conduct administrative tasks after hours. The registration of a new domain name will not be prioritised unless the economic implications are communicated effectively and in a timely manner. We recommend that strong consideration be given to the reach of any campaign so that it includes regional and rural businesses and doesn't solely focus on urban centres.

Thank you for the opportunity to comment. If you would like to discuss this matter further, please contact Alexandra Hordern on 02 6121 5312 or at alexandra.hordernC@asbfeo.gov.au.

Yours sincerely

Kate Carnell

Kate Carnell AO
Australian Small Business and Family Enterprise Ombudsman

T 1300 650 460 E info@asbfeo.gov.au
www.asbfeo.gov.au

Office of the Australian Small Business and Family Enterprise Ombudsman
GPO Box 1791, Canberra City ACT 2601